

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

In re: Donte Ramone Davis Amalie Minita Davis Debtors	CHAPTER 13 CASE NO. 23-50480
--	--

OBJECTION TO CLAIM(S)

The undersigned movant objects to the following claims for the reasons stated:

CLAIM NO.	NAME AND ADDRESS OF CLAIMANT	AMOUNT	OBJECTIONS
14	Wells Fargo Bank, N.A. P.O. Box 10438 MAC-F8235-02F Des Moines, IA 50306-0438 Wells Fargo Bank, N.A. C/O Corporation Service Compnay 100 Shocke Slip, Fl 2 Richmond, VA 23219-4100	\$2,471.72	Debtors object to the allowance of the secured status of the claim. Wells Fargo Bank, N.A. did not file a required UCC-1 financing statement to place a lien on the installed water heater. Therefore, Debtors ask that this claim be disallowed as a secured claim and allowed as an unsecured claim.

WHEREFORE, the undersigned prays that the Court, after notice and an opportunity for hearing, sustain the objection(s) or make other determination as is appropriate.

DATED: 12/05/2023

/s/David E. Wright
900 Lakeside Drive, Lynchburg, VA 24501

I hereby certify that I have served on the claimant by first-class mail to the person most recently designated on the claimant's original or amended proof of claim as the person to receive notices, at the address so indicated; and (i) if the objection is to a claim of the United States, or any of its officers or agencies, in the manner provided for service of a summons and complaint by Rule 7004(b)(4) or (5); or (ii) if the objection is to a claim of an insured depository institution, in the manner provide by Rule 7004(h).

DATED: 12/05/2023

/s/David E. Wright
Movant

Clerk, U.S. Bankruptcy Court
1101 Court St., Room 166, Lynchburg, VA 24504
(434) 845-0317

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

**IN RE: Donte Ramone Davis
Amalie Minita Davis
Debtor**

**CHAPTER 13
Case No. 23-50480**

NOTICE OF OBJECTION TO CLAIM

Donte Ramone Davis and Amalie Minita Davis have filed an objection to your claim in this bankruptcy case.

Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the court to eliminate or change your claim, then on or before **01/10/2024**, you or your lawyer must:

File with the court a written response to the objection, explaining your position, at:

1101 Court Street
Lynchburg VA 24504

If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date stated above.

You must also send a copy to David E. Wright, Cox Law Group, PLLC, 900 Lakeside Drive, Lynchburg VA 24501.

Attend the hearing on the objection by video, scheduled to be held on January 11, 2024 at 9:30 am by ZOOM. **MEETING ID 1603692643** and URL address
<https://vawb-uscourts-gov.zoomgov.com/j/1603692643>

Parties shall not appear in person. Please check the Court's website for information on how to attend.

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim.

Failure to file a response on or before the date stated above may result in the Court treating the Objection as uncontested, entering an order granting the Objection prior to the hearing and cancelling the hearing.

Date: 12/05/2023

Prepared by:

/s/ David E. Wright

David E. Wright, Counsel for Debtor

Cox Law Group, PLLC

900 Lakeside Drive

Lynchburg, VA 24501

dave@coxlawgroup.com

434-845-2600